



Federal Regulatory Affairs

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July 3, 2013

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

Re: *Improving 9-1-1 Reliability*, PS Dkt. No. 13-75; *Reliability and Continuity of Communications Networks, Including Broadband Technologies*; PS Dkt. No. 11-60

Dear Ms. Dortch:

On July 1, 2013, the undersigned of Frontier Communications spoke on the phone with Jeffery Goldthorp, Lauren H. Kravetz, John Healy, Michael Connelly, Eric Schmidt, Joel Thomas, and Cecilia Mateo of the Commission's Public Safety and Homeland Security Bureau. In the meeting the participants discussed the concepts Frontier presented in its comments responding to the Commission's *Notice of Proposed Rulemaking*<sup>1</sup> and the ex parte letter that Frontier submitted on June 18.<sup>2</sup>

With respect to network auditing, Frontier's comments recommended an audit period of at least three years.<sup>3</sup> Frontier explained that its circuit construction databases are done through a system, M6, that identifies and assigns circuit construction tasks necessary to design a new circuit. Frontier is in the process of auditing its circuits but that process is not complete and will not be complete for a period of years. Frontier does confirm, however, that once the information is audited it is included in a database and future audits should take less time on a going-forward basis.

The parties continued to discuss Frontier's concerns raised in its June 18 ex parte as to what the Commission would consider as a "Central Office" for purpose of complying with any new backup power requirements. Of Frontier's 2,689 host and remote offices that could be

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<sup>1</sup> *In re: Improving 9-1-1 Reliability*, PS Dkt. Nos. 13-75; *Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Dkt. No. 11-60, *Notice of Proposed Rulemaking*, FCC 13-33 (rel. Mar. 20, 2013) ("*NPRM*"). Comments of Frontier Communications, PS Dkt. Nos. 13-75, 11-60 (filed May 13, 2013) ("Frontier Comments").

<sup>2</sup> Letter from Michael D. Saperstein, Jr., Frontier Communications, to Marlene H. Dortch, FCC, PS Dkt. Nos. 13-75, 11-60 (filed June 18, 2013).

<sup>3</sup> Frontier Comments at 9.

considered “central offices” due to their switching capabilities, 855 serve PSAPs in some capacity though not all 855 PSAPs are Frontier customers of record.

Pursuant to Section 1.1206(b) of the Commission’s rules, 47 C.F.R. §1.1206(b), this letter is being filed electronically with your office today.

Please feel free to contact me with any further questions.

Sincerely,

A handwritten signature in blue ink, reading "Michael Saperstein, Jr." with a stylized flourish at the end.

Michael D. Saperstein, Jr.  
Vice President, Federal Regulatory Affairs  
Frontier Communications  
(202) 223-6807

cc: Jeffrey Goldthorp  
Lauren H. Kravetz  
John Healy  
Michael Connelly  
Eric Schmidt  
Joel Thomas  
Cecilia Mateo